

FILED

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WESTERN DISTRICT OF TEXAS

BY: ad
DEPUTY

(Corrected)

EXHIBIT B-2

U.S. Patent No. 9,576,255 – Ticketmaster LLC and Live Nation Worldwide, Inc.

Claim 10

Dynamic Ticket Systems LLC (“DTS”) provides evidence of infringement of claim 10 of U.S. Patent No. 9,576,255 (hereinafter “the ’255 patent”) by Ticket Master LLC (“Ticketmaster”) and Live Nation Worldwide, Inc. (“Live Nation”) (collectively “Defendants”). In support thereof, DTS provides the following claim charts.

“Accused Instrumentalities” as used herein refers to at least electronic ticketing and access control systems and all hardware and/or software used in the implementation of such systems including, but not limited to Ticketmaster’s SafeTix ticketing management system used by Live Nation. These claim charts demonstrate Defendants’ infringement by comparing each element of the asserted claims to corresponding components, aspects, and/or features of the Accused Instrumentalities. These claim charts are not intended to constitute an expert report on infringement. These claim charts include information provided by way of example, and not by way of limitation.

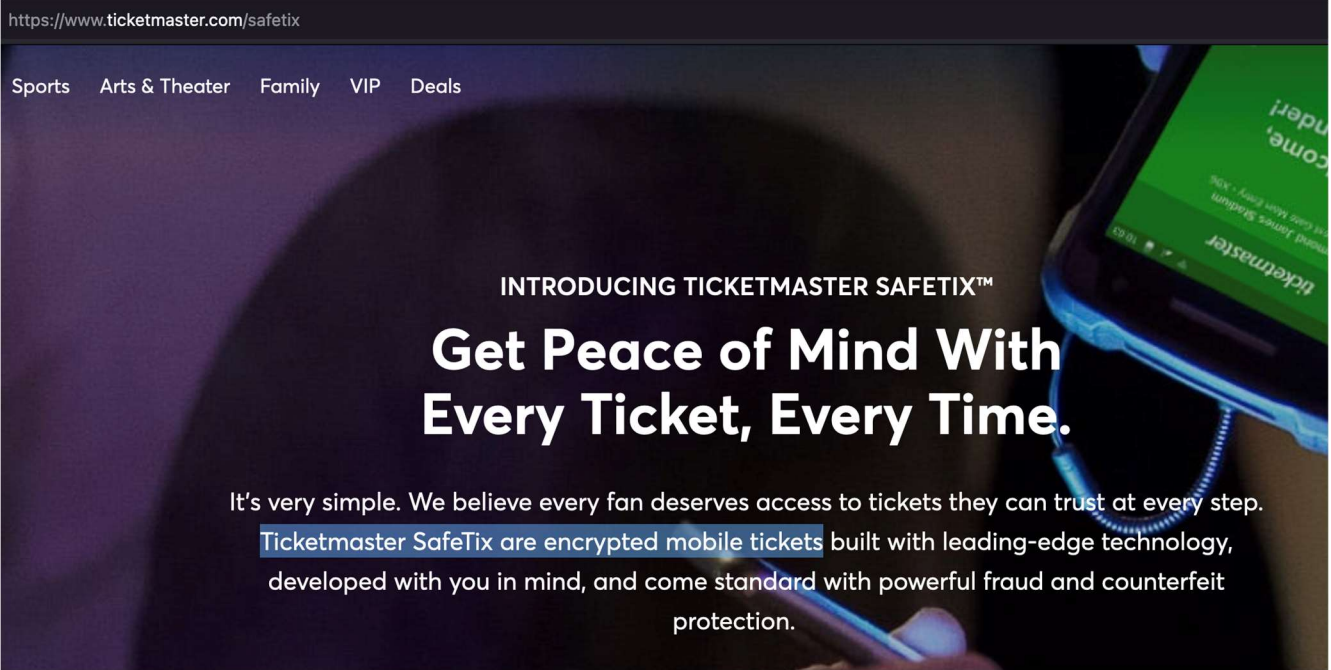
The analysis set forth below is based only upon information from publicly available resources regarding the Accused Instrumentalities, as Defendants have not yet provided any non-public information. An analysis of Defendants’ (or other third parties’) technical documentation and/or software source code may assist in fully identify all infringing features and functionality. Accordingly, DTS reserves the right to supplement this infringement analysis once such information is made available to DTS. Furthermore, DTS reserves the right to revise this infringement analysis, as appropriate, upon issuance of a court order construing any terms recited in the asserted claims.

DTS provides this evidence of infringement and related analysis without the benefit of claim construction or expert reports or discovery. DTS reserves the right to supplement, amend or otherwise modify this analysis and/or evidence based on any such claim construction or expert reports or discovery.

Unless otherwise noted, DTS contends that Defendants directly infringes the ’255 patent in violation of 35 U.S.C. § 271(a) by selling, offering to sell, making, using, and/or importing the Accused Instrumentalities. The following exemplary analysis demonstrates that infringement. Unless otherwise noted, DTS further contends that the evidence below supports a finding of indirect infringement under 35 U.S.C. §§ 271(b) and/or (c), in conjunction with other evidence of liability under one or more of those subsections. Each Defendant makes, uses, sells, imports, or offers for sale in the United States, or has made, used, sold, imported, or offered for sale in the past, without authority, or induces others to make, use, sell, import, or offer for sale in the United States, or has induced others to make, use, sell, import, or offer for sale in the past, without authority products, equipment, or services that infringe claim 10 of the ’255 patent, including without limitation, the Accused Instrumentalities.

Unless otherwise noted, DTS believes and contends that each element of each claim asserted herein is literally met through Defendants’ provision of the Accused Instrumentalities. However, to the extent that Defendants attempt to allege that any asserted claim element is not literally met, DTS believes and contends that such elements are met under the doctrine of equivalents. More specifically, in its investigation and analysis of the Accused Instrumentalities, DTS did not identify any substantial differences between the elements of the patent claims and the corresponding features of the Accused Instrumentalities, as set forth herein. In each instance, the identified feature of the Accused Instrumentalities performs at least substantially the same function in substantially the same way to achieve substantially the same result as the corresponding claim element.

To the extent the chart of an asserted claim relies on evidence about certain specifically-identified Accused Instrumentalities, DTS asserts that, on information and belief, any similarly-functioning instrumentalities also infringes the charted claim. DTS reserves the right to amend this infringement analysis based on other products made, used, sold, imported, or offered for sale by Defendants. DTS also reserves the right to amend this infringement analysis by citing other claims of the '255 patent, not listed in the claim chart, that are infringed by the Accused Instrumentalities. DTS further reserves the right to amend this infringement analysis by adding, subtracting, or otherwise modifying content in the "Accused Instrumentalities" column of each chart.

Claim # 10	Accused Instrumentalities
<p>A method of providing a ticket to a ticket holder comprising:</p>	<p>Ticketmaster practices and/or induces others to practice a method of providing a ticket to a ticket holder comprising:</p>  <p>https://www.ticketmaster.com/safetix - Accessed 6/29/2023</p>

in a ticket generating processing system; defining the rights associated with a ticket;

Ticket master performs and/or induces others to perform the step of defining the rights associated with a ticket in a ticket generating processing system.

Your Event, Your Way.

SafeTix gives you unprecedented flexibility.

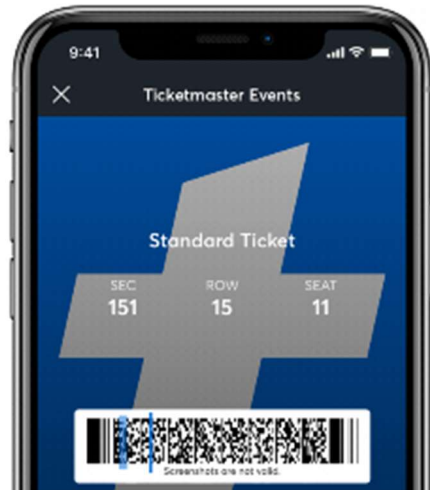
Customize your branded fan experience right in your app with the Ticketmaster SDK. And with TM1 at your fingertips, you can adjust entry to each event, tailor VIP experiences, or monitor ingress from anywhere.

<https://business.ticketmaster.com/safetix/>

determining a device to be associated with the ticket;

Ticket master performs and/or induces others to perform the step of determining a device to be associated with the ticket.

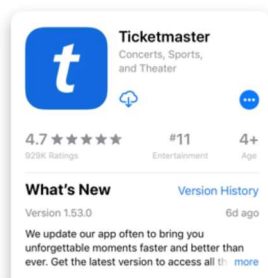
As the world has shifted to mobile, fans use their mobile devices to unlock all kinds of access. Mobile phones have become boarding passes for planes, keys for cars and hotel rooms, and now with Ticketmaster's SafeTix™ encrypted tickets, smartphones are the new concert ticket.



Built on the Presence® digital ticketing and venue access control platform, SafeTix™ creates a secure digital ticket that is connected to the original purchaser's Ticketmaster account. The purchaser can easily transfer tickets to their show buddies using the built-in transfer system, and each recipient's SafeTix ticket will then be linked to their individual Ticketmaster account. For the first time in concert history, artists have the opportunity to get to know not only the ticket buyer, but every ticketholder at every show in a Ticketmaster venue.

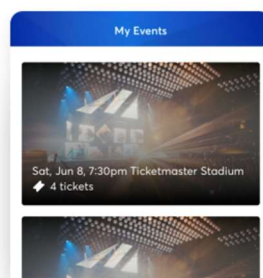
<https://business.ticketmaster.com/business-solutions/ticketmasters-safetix-encrypted-tickets-protect-fans-and-provide-artists-with-greater-visibility-into-event-attendees/> - Accessed 5/23/2023

Your Phone Is Your Ticket



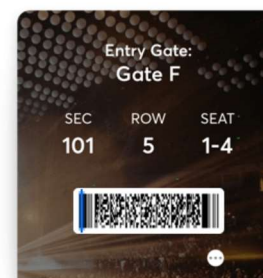
Step 1

Download our App from the App Store or Google Play.



Step 2

Sign in to your Ticketmaster account, then tap on My Events to locate your order.



Step 3

Tap your order to view your tickets.
At entry, show your phone to get
scanned, and you're in!

Ticket Tip
Concerned about cell phone service at venues? This ticket has you covered. Once you view it in our App, your ticket is automatically saved so it's always ready.

Concerned about cell phone service at venues? This ticket has you covered. Once you view it in our App, your ticket is automatically saved so it's always ready.

<https://www.ticketmaster.com/safetix> - Accessed 5/23/2023

	<p><u>SafeTix uses new technology by tying a unique, identifiable digital ticket to your mobile phone</u> through an encrypted barcode that automatically refreshes every few seconds. It also includes NFC technology that will allow fans to enter venues through a simple "tap and go" experience at venue entrances. These enhancements protect against tickets being screenshotted or photocopied and sold multiple times by shady resellers.</p> <p>https://blog.ticketmaster.com/introducing-safetix-ticketmasters-next-gen-encrypted-tickets/ - Accessed 6/8/2023</p>
creating a dynamic link to a file that represents the ticket;	<p>Ticket master performs and/or induces others to perform the step of creating a dynamic link to a file that represents the ticket.</p> <p>4] Render the SafeTix encrypted token via the Secure Entry SDK</p> <p>Overview:</p> <ul style="list-style-type: none"> · Pass Token to the Secure Entry SDK to render the Rotating Barcode <p>This integration applies to all digital tickets events that are enabled for SafeTix. The API will determine the event configuration, create the right token, and the SDK's will render the correct barcode.</p> <p>https://developer.ticketmaster.com/products-and-docs/apis/partner/safetix/ - Accessed 6/29/2023</p>

2. Why do we need the barcode for SafeTix events?

The barcode is a required parameter for the SecureRender API. The barcode is returned in the * Order Management API* response. The barcode is used to determine if a valid ticket has been created before it generates the token. Partners are required to call Secure RenderAPI to refresh the SafeTix token and you pass the barcode in the request. The numerical value of the barcode does not change, the tokens change.

3. What is the Device ID? This is a unique identifier specific to that device/app install. If you can't get the hardware number, then you should send a unique identifier from that app on that specific device. It can be a GUID that is sticky to that app install. The deviceId must be unique which helps Ticketmaster better combat fraud and improve security. An order-uuid while unique will not help us differentiate the devices enough as a user who has two devices and two applications installed would give us the same deviceId. This will not work for our SafeTix system.

https://developer.ticketmaster.com/products-and-docs/apis/partner/safetix/#partnert_api_integration – Accessed 6/29/2023

providing the dynamic link to a ticket holder,

Ticket master performs and/or induces others to perform the step of providing the dynamic link to a ticket holder.

Can I still enter my event with a screenshot of my ticket?

No. Your barcode includes leading-edge technology with fraud and counterfeit protection, so you won't be able to use screenshots or printouts. When you arrive at your event, use the Ticketmaster app or mobile website to locate your tickets. Your phone's your ticket, which you'll show to the ticket scanner, get your phone scanned – and you're in!

How do I find my ticket in the Ticketmaster app?

1. Download our App from the App Store or Google Play.
2. Sign into your Ticketmaster account, then tap on My Events to locate your order.
3. Tap your orders to view your tickets. At entry, show your phone to get scanned and you're in!

<https://www.ticketmaster.com/safetix>

Electronic Tickets (ETickets)

An electronic ticket (eTicket) can be a Mobile Entry or Print-at-Home ticket. Sign into your [My Account](#) to find and access your eTicket. There can be a delay in accessing your ticket, but it will be available before your event.

<https://help.ticketmaster.com/hc/en-us/articles/9641645631889-Find-My-Tickets>

How do I accept transferred tickets?

Accepting tickets is easy! Follow these steps and you'll have your tickets in no time:

Text **Email**

1. Click the **Accept Tickets** link in your email.
2. Sign in or create a new account — make sure you use the same email for your account and that the tickets were sent to.
3. To view your tickets, select **View Tickets**.

<https://ticketmaster-us.zendesk.com/hc/en-us/articles/9612226365201-How-do-I-accept-transferred-tickets->

wherein the ticket may be resold in a secondary market with price limits, time limits, and geographical limits defined by a ticket issuer.

Ticket master performs and/or induces others to perform the step of wherein the ticket may be resold in a secondary market with price limits, time limits, and geographical limits defined by a ticket issuer.

How do I sell tickets?

Listing and selling tickets with Ticketmaster is easy, there are two simple ways to do it.

Listing from your account

Ticketmaster app [Ticketmaster.com](#)

1. Sign into your [My Account](#).
2. Select your order in My Events.
3. Tap the **Sell** button. If the button doesn't appear, is grayed out or you receive a message that the Event Organizer hasn't activated resale, your tickets aren't eligible for resale.
4. Select the ticket(s) you want to sell and tap **Continue**.
5. Follow the prompts, choose your pricing and enter a payout method. Skip the hassle by choosing the debit card payout option — it requires no verification process on your part. Visit the FAQ [How and when do I get paid for tickets I sell?](#) to learn more

<https://ticketmaster-us.zendesk.com/hc/en-us/articles/9672915828881-How-do-I-sell-tickets->

Why doesn't every event include resale tickets?

Some artists, teams or venues may not allow resale for certain rows, seats or events. But we're continuously working with them to include 100% verified resale tickets for more events in the future.

<https://ticketmaster-us.zendesk.com/hc/en-us/articles/9787784659857-Why-doesn-t-every-event-include-resale-tickets->

Why can't I sell my tickets below face value for my event?

The artist, venue or Event Organizer has set face value as the minimum resale price for that event.

<https://ticketmaster-us.zendesk.com/hc/en-us/articles/9787707819793-Why-can-t-I-sell-my-tickets-below-face-value-for-my-event->

What happens if my tickets are not sold?

Your tickets will remain available for purchase until the event's resale deadline expires, which varies by event. Any tickets that have not sold will be placed back into your account for your use.

Unsold tickets aren't eligible for refunds, but you can still use the ticket(s) by removing the listing. Visit the FAQ [How do I edit or remove tickets listed for resale?](#) for more information.

<https://ticketmaster-us.zendesk.com/hc/en-us/articles/9785003267089-What-happens-if-my-tickets-are-not-sold->

Caveat: The notes and/or cited excerpts utilized herein are set forth for illustrative purposes only and are not meant to be limiting in any manner. For example, the notes and/or cited excerpts, may or may not be supplemented or substituted with different excerpt(s) of the relevant reference(s), as appropriate. Further, to the extent any error(s) and/or omission(s) exist herein, all rights are reserved to correct the same.